

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Brian Scott Hodge
Laura Beth Hodge, Debtors**

**Case No. 25-01128-JAW
CHAPTER 13**

MOTION TO AJUST PLAN PAYMENT

COME NOW, Debtors, by and through counsel, and move this Court to modify their Chapter 13 plan, and in support thereof, would show the Court as follows:

1. Debtors commenced this case on May 1, 2025 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. The bar date for filing proof of claims was July 10, 2025, for all creditors and October 28, 2025, for government entities.
3. That all expected government claims have been filed.
4. That Debtor's monthly plan payment should be recalculated to only pay timely filed claims over the full sixty (60) months of the plan.

WHEREFORE, Debtors prays that the Trustee recalculate the plan payment to pay only the timely filed claims over the full sixty (60) months through their bankruptcy plan and for such additional or alternative relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MS Bar No. 103469)

Of Counsel:
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CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice and Motion to Adjust Plan Payment was forwarded on July 22, 2025, to:

By Electronic CM/ECF Notice:

Chapter 13 Case Trustee

U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.